IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 25-

: DATE FILED: April 2, 2025

ANIRUTH KUPPUSAMY : VIOLATIONS:

18 U.S.C. § 2251(a) (manufacture of child

pornography - 1 count)

: 18 U.S.C. § 2252(a)(2), (b)(1) (receipt of

child pornography - 1 count)

18 U.S.C. § 2252A(a)(5), (b)(2) (possession

: of child pornography - 1 count)

18 U.S.C. § 2422(b) (use of interstate commerce facility to entice a minor to

engage in sexually explicit conduct - 1 count)

: Notice of Forefeiture

INDICTMENT

:

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 11, 2025, in the Eastern District of Pennsylvania, defendant

ANIRUTH KUPPUSAMY

employed, used, persuaded, induced, enticed, and coerced Minor #1, who was under the age of 18 years and is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and ANIRUTH KUPPUSAMY knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about February 2, 2025 to on or about February 22, 2025, in the Eastern

District of Pennsylvania, defendant

ANIRUTH KUPPUSAMY

knowingly received visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the production of which involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(2), (b)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2025, in the Eastern District of Pennsylvania, defendant

ANIRUTH KUPPUSAMY

knowingly possessed matter, that is, at least one of the following: one Apple iPhone 15 bearing serial number D173DC652G, which contained child pornography that had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that were produced using materials that had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2252A(a)(5), (b)(2).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about December 20, 2024 to on or about March 8, 2025, in the Eastern District of Pennsylvania, defendant

ANIRUTH KUPPUSAMY

used a facility and means of interstate and foreign commerce, that is, the Internet and cellular telephone service, to persuade, induce, entice and coerce Minor #1, who was under the age of 18 years and is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacture and receipt of child pornography, in violation of Title 18, United States Code, Sections 2251(a) and 2252(a)(2), respectively, and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections
 2251(a), 2252(a)(2), 2252A, and 2422(b), as set forth in this indictment, defendant

ANIRUTH KUPPUSAMY

shall forfeit to the United States of America:

- (a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;
- (b) any property, real or personal, constituting or traceable to gross
 profits or other proceeds obtained from such violations; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including but not limited to:
 - (1) Apple iPhone 15 bearing serial number D173DC652G

Pursuant to Title 18, United S



DAVID METCALF United States Attorney No._____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania Criminal Division

THE UNITED STATES OF AMERICA

VS.

ANIRUTH KUPPUSAMY

18 U.S.C. § 2422(b) (use of interstate commerce facility to entice a minor to engage in 18 U.S.C. § 2252(a)(2),(b)(1) (receipt of child pornography - 1 count) 18 U.S.C. § 2252A(a)(5), (b)(2) (possession of child pornography - 1 count) 18 U.S.C. § 2251(a) (manufacture of child pornography -1 count) INDICTMENT Counts

